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U.S. DISTRICT COURT
DISTRICT OF UTAH

Attorney for Defendant


IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA	:	
	:	
Plaintiff,	:	MOTION TO ENLARGE TIME FOR
	:	FILING MOTIONS
vs.	:	
	:	CASE No. 2:02 CR 0708PGC
WELDON H. ANGELOS	:	
	:	Judge Paul G. Cassell
Defendants.	:	
	:	

Comes now Defendant Weldon H. Angelos by and through his attorney, Jerome H. Mooney and moves the Court to enlarge the time for filing of motions.

At the time of arraignment of this defendant, the Magistrate Judge set November 22, 2002 as the date for the government to provide discovery, and the 13th of December for the filing of defense motions. On the 18th of November, 2002 the Government filed its Statement of Discovery Policy, and provided 85 pages of discovery.

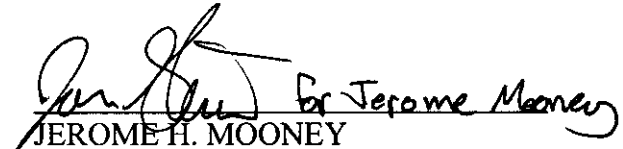
At the time of this action, the Assistant United States Attorney on the case, Robert Lund, was on vacation. Upon his return, and communications with counsel during the first week of December of 2002, it was learned that there is additional discovery that was not included in the materials provided to counsel. Although Mr. Lund has undertaken efforts to provide this material



to counsel, as of this date it has still not been received. It is anticipated that some of this material may prompt one or motions to be filed on behalf of this defendant, motions that would not be appropriate or meaningful until there has been a full opportunity to review the discovery.

Wherefore, defendant prays that the time for filing motions be enlarged allowing for a period of three weeks following receipt of the remaining discovery.

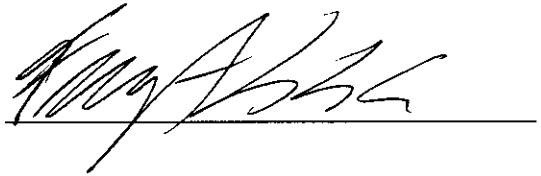
DATED this 13th day of December, 2002.


JEROME H. MOONEY
Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 13 day of December, 2002, a copy of the foregoing was mailed, postage prepaid, to the following:

Robert A. Lund
Attorney for Plaintiff
185 South State Street, Suite 400
Salt Lake City, UT 84111

A handwritten signature in black ink, appearing to read "Robert A. Lund", is written over a horizontal line.

Lee Rasmussen
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